

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

| | | |
|-------------------------|---|----------------------------|
| FAMBROUGH, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | Case No. 4:19-cv-00218-SRB |
| |) | |
| MISSOURI FAMILY SUPPORT |) | |
| DIVISION, |) | |
| |) | |
| Defendant. |) | |

**DEFENDANT MISSOURI FAMILY SUPPORT DIVISION’S MOTION
TO DISMISS OR, IN THE ALTERNATIVE, MOTION FOR MORE
DEFINITE STATEMENT**

Defendant Missouri Family Support Division (“FSD”), by and through undersigned counsel, respectfully moves this Court to dismiss Plaintiffs Heather and William Fambrough’s (“Plaintiffs”) Complaint as to FSD because (1) Plaintiffs failed to exhaust their administrative remedies and (2) William Fambrough does not have standing in this matter. In the alternative, if the Court does not grant FSD’s Motion to Dismiss, FSD respectfully moves this Court to order Plaintiffs to provide a more definite statement of their claims. FSD incorporates by reference its Suggestions in Support of this Motion, which is filed simultaneously herewith.

Respectfully submitted,

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/s/ Laura M. Robb

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*Attorneys for Defendant Missouri Family
Support Division*

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent electronic notification to all counsel of record, and I mailed a copy to Plaintiffs at:

Heather and William Fambrough
6101 N. Belleview Ave.
Kansas City, MO 64118

/s/ Laura M. Robb